



JAMES K. SCHULTZ
Direct: (619) 296-2018
jschultz@sessions.legal

Via ECF

September 9, 2020

Honorable Paul G. Gardephe
Courtroom 705
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Michelo, et al. v. National Collegiate Student Loan Trust 2007-2, et al.*
Case No.: 1:18-cv-01781-PGG
Bifulco, et al. v. National Collegiate Student Loan Trust 2006-4, et al.
Case No.: 1:18-cv-07692-PGG

Dear Judge Gardephe:

We represent Transworld Systems Inc. (“TSI”) in the above-referenced consolidated action. Pursuant to Your Honor’s Individual Rules of Practice No. II. A and B, TSI writes to request permission to file its Reply in Support of its Objection to Order dated July 17, 2020 (the “Order”), under seal.

TSI filed its objection to the Order on July 31, 2020 (Dkt. 201), and requested that the objection and supporting exhibits be maintained under seal given that they contain medical information.

TSI now seeks, pursuant to Your Honor’s Individual Practice, to file its Reply under seal given that it too references private medical information.

Paragraph 2 of the Protective Order sets forth what may be designated as confidential. Dkt. 92, ¶ 2. Specifically, paragraph 2(d) contemplates: “personal information including, but not limited to,...medical information,...other information that individuals would not normally reveal, and any information that a Producing Party believes in good faith to be subject to data protection laws or other privacy obligations;”).

In sum, TSI requests permission to file its Reply brief under seal.

Pursuant to Your Honor’s Individual Practices, the Reply is being contemporaneously filed under seal in the ECF system, electronically related to the instant letter motion, and will be provided to counsel of record in unsealed format.

1545 Hotel Circle South, Suite 150, San Diego, CA 92108-3426

Tel: (619) 296-2018 Fax: (877) 334-0661 www.sessions-law.com

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SESSIONS FISHMAN NATHAN & ISRAEL
ATTORNEYS AT LAW

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Thank you for Your Honor's attention to this matter.

Respectfully submitted,

/s/ James K. Schultz
Counsel for Transworld Systems Inc.

cc: All counsel of record (via ECF)